

In The United States District Court
Middle District of Pennsylvania

WM. R. Branch
Plaintiff

HARRISBURG

No. CV 00-1728

Vs.

MR. RUSSIAN, et. al.,
Defendants

MARY E. D'ANDREA, CLERK

DEPUTY CLERK

(Judge CONNER)

Reply to Defendants BRIEF in OPPOSITION TO
Plaintiff motion for Leave to file a Supplemental
Pleading

Respectfully SIR Rule 15(d) is designed to provide Plaintiff with the means to include Transactions or occurrences or Events which happened since the date of the pleading.

To me that appears to be clear. in the instant case Retaliation is a Key Pleading Justice Dictates the need for supplemental Pleading as I have been physically attacked By Sgt mcAndrew and when I Reported it I was called a Lier and put in the RHU/ Hole For 90 days, another Key Pleading Religious Freedom, again the staff has forced me to cut my hair while I am pleading This same issue before this most noble and august Tribune in so doing they Violated the protection the Court affords a person accessing the court and while the issue was not decided and no order written the D.O.C. Staff took matters into their own hands.

Exhibit AA-1
Pg 1 In the process they Violated their own policy 819-3 Pg 8 the FCPD is to collect the information for Review and send it to the Religious accommodation Review Committee. No disciplinary action is to be taken untill the RAR Committee has forward their decision to the Regional Deputy Secretary and finally back to me. I Believe that because I am Sueing Pastor Gagas and the staff they have never sent out my Request for a hair exemption, for these Reasons and many more the Court Should Per F.R.C.P. 15(d) allow supplemental pleading along with Rule 56(f) in order for me to show "Causal Link".

The TRIAL is Set For may that is 3 1/2 months away that is more than enough time for Defense counsel to Prepare her case, the fact she has asked for a continues Because she Planned a TRIP and Time was Granted Shows that

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is able to insure that Counsel will not be prejudiced by this pleading which should be liberally granted as well as pleadings to be liberally read. I am not a lawyer and I do not have any funds for copying. I have asked for Counsel to be appointed and I asked for a jury trial if I am not assisted by this court when the government brings its mighty power down upon me. Justice can not be served because I have no money or can not present my arguments before this noble court, being denied based upon procedural rules and the court does not tell me what I need to get an injunction or a jury trial or to avoid summary judgment!

When the rights afforded all inmates are being denied and violated by a people duty bound to protect said constitutional rights, the courts have already given great difference to D.O.C. employees in performance of their duty but when it is apparent from the pleading that these people have violated the trust the courts have placed in said people, chastisement is ~~not~~ mandated in the ~~interest~~ interest of justice.

Therefore I ask this august court to grant me supplemental pleading per Fed. Rules of Civil Procedures 15(d) as Counsel has had this pleading for over two years and at any time investigated it and prepared for trial per the date I send it to the courts see: court Docket Sheet.

Respectfully sir by the preponderance of evidence any jury would find that the D.O.C. has violated my rights and has retaliated against me for accessing the courts and used excessive force on me in a conspiracy to force me to drop my law suit's and to stop reporting their misconducts. Please send me 7 marshal forms.

Proof of Service

Ms Mosley SDAG Strawberry Sq Harrisburg Pa. 17120

Unsworn Declaration

I affirm under penalty of the law that the above is true

Date 2-14-04

William Branch CF-3756
Po Box 256
Waymart Pa 18472

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INMATE MAIL
PA DEPARTMENT OF CORRECTIONS

Legal Mail
FILED Box 983
HARRISBURG Pa 17108

FEB 20 2004
MARY E. DIANDREA, CLERK
PA DEPT CORRECTIONS

